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Attorney for: Defendant Keith Williams

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES,

Plaintiff,

vs.

KEITH WILLIAMS,

Defendant.

No. 2:14-cr-00321-GMN-NJK

STIPULATION TO CONTINUE
HEARING DATE FOR MOTION FOR
EARLY TERMINATION OF
SUPERVISED RELEASE [ECF NO. 442]
(First Request)

CERTIFICATION: This Stipulation is timely filed.

IT IS HEREBY STIPULATED AND AGREED by and between JASON M. FRIERSON, United States Attorney, and AFROZA YEASMIN, Assistant United States Attorney, counsel for the United States of America, and MARK D. EIBERT, counsel for Defendant KEITH WILLIAMS ("WILLIAMS"), that the hearing on the motion for early termination of supervised release [ECF no. 442] for defendant Williams may, with the concurrence of the Court, be continued from its current setting of December 5, 2024 at 10:00 am to the new date of December 16, 2024 at 11:00 am.

This stipulation is entered into for the following reasons:

1. That defense counsel has a long scheduled medical procedure on December 5, 2024 in California;
2. That upon alerting the government and the Court about the aforementioned conflict preventing defense counsel's personal appearance in the district for the

current setting of the hearing, the Court provided December 16 at 11:00 am as a good date to reset the matter;

3. That the motion filed for early termination of supervised release [ECF no. 442] for defendant Williams is unopposed by the government, and probation defers to the Court but does not oppose the motion;
4. That defendant Williams is not incarcerated and does not object to a continuance;
5. That counsel for the government agrees to a continuance; and
6. That denial of this request for a continuance could result in a miscarriage of justice.

WHEREFORE, the parties respectfully request that the Court accept this Stipulation and enter an Order rescheduling the hearing for December 16 at 11:00 am.

A proposed Order is attached for the Court's convenience.

DATED this 21st day of November 2024.

// s // Afroza Yeasmin

AFROZA YEASMIN, Esq.
Assistant United States Attorney
Counsel for the United States

// s // Mark D. Eibert

MARK D. EIBERT, Esq.
Counsel for Defendant Keith Williams

CERTIFICATE OF SERVICE

The undersigned hereby certifies that his business mailing address is P. O. Box 1126, Half Moon Bay, CA 94019, that he is not a party to this action, that he is a citizen of the United States of such age and discretion to be competent to serve papers, and that on the below date he caused a true and accurate copy of

STIPULATION TO RESET HEARING DATE AND PROPOSED ORDER

To be served via ECF on the United States District Court, which will e-serve counsel of record in this case, including the following:

AFROZA YEASMIN, ESQ.
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, NV 89101
Email Afroza.Yeasmin@usdoj.gov

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief. Executed on November 21, 2024 at Half Moon Bay, California.

/s/ Mark D. Eibert

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES,

Plaintiff,

vs.

KEITH WILLIAMS,

Defendant.

No. 2:14-cr-00321-GMN-NJK

ORDER

Upon stipulation of the parties, concurrence with the Court, and good cause appearing therefore, it is hereby ORDERED AS FOLLOWS:

The hearing currently scheduled for December 5, 2024 at 10:00 a.m. is vacated, and is reset for December 16, 2024 at 11:00 a.m.

IT IS SO ORDERED.

DATED: November 22, 2024


HON. GLORIA M. NAVARRO
United States District Judge